05/05/04 16:30 FAX @1009

## REMARKS/ARGUMENTS

The Office Action mailed January 5, 2004 has been reviewed and carefully considered. Claims 1-22 have been amended. Claims 1-22 are pending in this application, with claims 1, 18, 19, and 22 being the only independent claims. Reconsideration of the above-identified application, as herein amended and in view of the following remarks, is respectfully requested.

The claims 1-22 have been amended to put them in better form according to U.S. Patent practice. The independent claims are further amended as described below for clarification.

In the Office Action mailed January 5, 2004, claims 1-7, 16, 18-20, and 22 stand rejected under 35 U.S.C. §102(b) as anticipated by U.S. Patent No. 5,764,730 (Rabe).

Claims 8-10, 13-15 and 17 stand rejected under 35 U.S.C. §103 as unpatentable over Rabe in view of U.S. Patent No. 6,324,405 (Young). Claim 11 stands rejected under 35 U.S.C. §103 as unpatentable over Rabe and Young in further view of U.S. Patent No. 6,556,820 (Le). Claim 12 stands rejected under 35 U.S.C. §103 as unpatentable over Rabe and Young in further view of U.S. Patent No. 6,631,140 (Sjodin). Claim 21 stands rejected under 35 U.S.C. §103 as unpatentable over Rabe and Le.

Before discussing the cited prior art and the Examiner's rejections of the claims in view of that art, a brief summary of the present invention is appropriate. The present invention relates to a method for updating the locations of multiple subscriber identities of a single mobile station in a mobile communication network. According to the present invention, all subscriber identities of a mobile station are accessible through a common subscriber identity (see page 3, lines 6-10, of the specification). The mobility management (MM) layer, which includes, for example, the procedures for location area update, attachment and detachment of subscriber identity, authentication and subscriber identification, is divided into two parts: (1) a subscriber-specific part

05/05/04 16:31 FAX 2010

and (2) a coordinating part (see page 4, lines 1-5). Common functions of <u>each connection</u> of a subscriber identity in a mobile station use the coordinating part (page 4, lines 5-10). The subscriber-specific part (dedicated part of the MM layer) is used for functions associated with a particular subscriber identity (page 4, lines 20-21).

Independent claim 1 has been amended to clearly recite that the location management functions are divided into two parts (subscriber-specific and coordinating parts) and that the common functions that are common to <u>each connection</u> of a subscriber identity use the coordinating part. Independent claims 18, 19, and 22 also recite that there are two parts or elements, one for handling common function and the other for handling subscriber-specific functions.

Rabe discloses a radio telephone having a plurality of subscriber identities. As stated by the Examiner and disclosed in Fig. 5 and the associated text, the subscriber identities are registered with the radio telephone network. The registration allows a determination of active subscriber identities and allows automatic roaming (see col. 9, lines 51-57). Rabe further discloses that a database in the telephone network associates the subscriber identities with the radiotelephone (col. 12, lines 56-64). However, it is respectfully submitted that Rabe fails to teach or suggest the step of "dividing the location management functions associated with a mobile station (MS) into at least two parts of which at least one is reserved as common to a plurality of connections of the subscriber identities (31) in one and the same mobile station (MS) and at least one other part is reserved as separate for each connection of the plural connections of the subscriber identities (31) in one and the same mobile station (MS)". Although Rabe discloses at col. 11, starting at line 46, the handling of more than one subscriber identity, there is no indication that the location management functions are divided into a subscriber-specific part and a common part, as recited in the independent claims 1, 18, 19, and 22.

Furthermore, Rabe fails to disclose managing the plural connections of the

subscriber identities using a common identifier, as recited in independent claim 1. Although

Rabe registers individual subscriber identities on a database and associates them with a

radiotelephone, Rabe fails to disclose, teach or suggest managing the connections of the

subscriber-identities using a common indentity.

In view of the above amendments and remarks, it is respectfully submitted that

independent claims 1, 18, 19, and 22 are not anticipated by Rabe under 35 U.S.C. §102.

Furthermore, since Rabe fails to provide any teaching or suggestion for dividing the location

management function into common and subscriber-specific parts, it is respectfully submitted that

independent claims 1, 18, 19, and 22 are also allowable over Rabe under 35 U.S.C. §103.

Dependent claims 2-17 and 20-21, being dependent on independent claim 1 and

19, are deemed allowable for the same reasons expressed above with respect to independent

claims 1 and 19.

The application is now deemed to be in condition for allowance and notice to that

effect is solicited.

Respectfully submitted,

COHEN, PONTANI, LIEBERMAN & PAVANE

Bv

Alfred W. Froebrich

Røg. No. 38,887

551 Fifth Avenue, Suite 1210 New York, New York 10176

(212) 687-2770

Dated: May 5, 2004